

## Re: Insurance Carrier Questions and Preservation Hold

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From: Andre Bisasor (quickquantum@aol.com)  
To: elanders@morrisonmahoney.com  
Cc: lsmith@morrisonmahoney.com; dsonneborn@preti.com  
Date: Monday, March 25, 2024 at 01:53 PM EDT

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You have not answered my specific questions below.

-Andre

On Tuesday, March 19, 2024 at 04:03:40 PM EDT, Andre Bisasor <quickquantum@aol.com> wrote:

Ed

I dont believe you actually answered my question: Can I direct to you, or can you receive, letters or legal documents from me, on behalf of the insurance carrier(s)?

In other words, can you pass along letters or legal documents from me to the insurance carriers and ensure they get it?

Andre Bisasor

On Tuesday, March 19, 2024 at 03:58:20 PM EDT, Landers, Edwin <elanders@morrisonmahoney.com> wrote:

Dear Mr. Bisasor,

We are representing only the Donais defendants in this action.

Regards,

Ed

**Edwin F. Landers, Jr.**

Partner

MORRISON MAHONEY LLP  
250 Summer Street, Boston, MA 02210  
T (617) 439-7583 | F (617) 342-4967  
[ELanders@morrisonmahoney.com](mailto:ELanders@morrisonmahoney.com) | [www.morrisonmahoney.com](http://www.morrisonmahoney.com)

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**From:** Andre Bisasor <quickquantum@aol.com>  
**Sent:** Tuesday, March 19, 2024 3:55 PM  
**To:** Landers, Edwin <ELanders@morrisonmahoney.com>  
**Cc:** Smith, Linda <LSmith@morrisonmahoney.com>; Sonneborn, Daniel R. <dsonneborn@preti.com>  
**Subject:** Re: Insurance Carrier Questions and Preservation Hold

External Email from Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)>. Do not click on links, open attachments, or reply before confirming this is a valid email.

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Ed,

To be clear, it sounds like you are again refusing to answer the below questions.

However, I did not ask one of the questions previously and so can you at least answer that question as follows: **Can I direct to you, or can you receive, letters or legal documents from me, on behalf of the insurance carrier(s)?**

Andre Bisasor

On Tuesday, March 19, 2024 at 03:46:48 PM EDT, Landers, Edwin <[elanders@morrisonmahoney.com](mailto:elanders@morrisonmahoney.com)> wrote:

Dear Mr. Bisasor,

The Donais defendants' position remains unchanged from that conveyed to you in the attached email exchange of July 19, 2023.

Regards,

Ed

**Edwin F. Landers, Jr.**

Partner

MORRISON MAHONEY LLP  
250 Summer Street, Boston, MA 02210  
T (617) 439-7583 | F (617) 342-4967  
[ELanders@morrisonmahoney.com](mailto:ELanders@morrisonmahoney.com) | [www.morrisonmahoney.com](http://www.morrisonmahoney.com)

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**From:** Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)>  
**Sent:** Friday, March 15, 2024 12:15 PM  
**To:** Landers, Edwin <[ELanders@morrisonmahoney.com](mailto:ELanders@morrisonmahoney.com)>  
**Subject:** Insurance Carrier Questions and Preservation Hold

External Email from Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)>. Do not click on links, open attachments, or reply before confirming this is a valid email.

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Dear Ed,

I have a couple questions pertaining to this matter as follows:

1. What is the name of the insurance carrier(s) for the Donais defendants?
2. Also, what is the location and address of the insurance carrier(s)?
3. Are you insurance counsel for this insurance carrier(s)?
4. Can I direct to you, or can you receive, letters or legal documents from me, on behalf of the insurance carrier(s)?
5. What is the policy limit for the policy applicable to this matter that covers the Donais defendants?

Can you please answer these questions or any of them? I may have asked some of these to you before but I am asking again here in one place.

NB: Please remember to preserve all documents, emails, correspondence and materials that are relevant to this matter including matters applicable to potential discovery, deposition and for trial. This is a reminder of a preservation/litigation hold that applies to all defendants as well as to the insurance carrier(s).

I look forward to your reply.

Sincerely,

Andre Bisasor

Mr. Bisasor,

We agree with the position set forth by Dan. We also do not believe that any insurance coverage has any bearing on the motions before the court.

Regards,

Ed

**Edwin F. Landers, Jr.**

Partner

MORRISON MAHONEY LLP  
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[ELanders@morrisonmahoney.com](mailto:ELanders@morrisonmahoney.com) | [www.morrisonmahoney.com](http://www.morrisonmahoney.com)

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**From:** Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)>

**Sent:** Wednesday, July 19, 2023 3:20 PM

**To:** Landers, Edwin <[ELanders@morrisonmahoney.com](mailto:ELanders@morrisonmahoney.com)>; Donovan, Ian <[IDonovan@morrisonmahoney.com](mailto:IDonovan@morrisonmahoney.com)>;

Saturley, William C. <[wsaturley@preti.com](mailto:wsaturley@preti.com)>; Sonneborn, Daniel R. <[DSonneborn@preti.com](mailto:DSonneborn@preti.com)>

**Subject:** Re: Insurance question

External Email from Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)>. Do not click on links, open attachments, or reply before confirming this is a valid email.

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Dan,

If you do not want to give me the name of the insurance company, can you confirm you are insurance counsel?

So are you not denying that you are insurance counsel?

I can infer that the answer to that is yes.

Andre

On Wednesday, July 19, 2023 at 03:16:02 PM EDT, Sonneborn, Daniel R. <[dsonneborn@preti.com](mailto:dsonneborn@preti.com)> wrote:

Mr. Bisasor,

That information will be provided to you at the time dictated by the Federal Rules of Civil Procedure and Local Rules. We see no reason to provide it sooner.

Thank you,

Dan

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**Daniel R. Sonneborn**  
Director  
PretiFlaherty

**From:** Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)>  
**Sent:** Wednesday, July 19, 2023 12:09 PM  
**To:** Sonneborn, Daniel R. <[DSonneborn@preti.com](mailto:DSonneborn@preti.com)>; Edwin Landers <[elanders@morrisonmahoney.com](mailto:elanders@morrisonmahoney.com)>; Ian Donovan <[idonovan@morrisonmahoney.com](mailto:idonovan@morrisonmahoney.com)>; Saturley, William C. <[WSaturley@preti.com](mailto:WSaturley@preti.com)>  
**Subject:** Insurance question

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Dear Ed, Dan, and All,

Are you or you insurance counsel for the defendants malpractice insurance carrier or any other insurance carrier that pertains to this case?

Also, could you inform me of the name of the insurance carrier(s), regardless of whether you are insurance counsel or not

Thanks

Andre

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